

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
CHEVRON CORPORATION,

Plaintiff,

-against-

STEVEN R. DONZIGER, et al.,

Defendants.
----- X

MEMO ENDORSED

Case No. 11 Civ. 0691 (LAK)

**CHEVRON CORPORATION'S
NOTICE OF MOTION TO BIFURCATE TRIAL**

PLEASE TAKE NOTICE that upon the memorandum of law submitted herewith; all prior pleadings and proceedings in this and related actions; and such argument as may be received by this Court at the time of a hearing, plaintiff Chevron Corporation, by and through its undersigned counsel, moves this Court for an order pursuant to Fed. R. Civ. P. 42(b) providing that the trial of this action shall proceed in the following manner.

The liability of Defendants Steven R. Donziger, The Law Offices of Steven R. Donziger, and Donziger & Associates PLLC (the "Donziger Defendants") on all claims shall be tried to a jury.

Upon a verdict of liability, the amount of compensatory and punitive monetary damages owed to Chevron Corporation by the Donziger Defendant shall be tried to a jury.

Upon conclusion of the jury proceedings, and to the extent the Court deems necessary based on the outcome of the jury proceedings, the liability of Defendants Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguajé on all claims to which they are defendants (as

Denied
SO ORDERED

[Signature]
LEWIS A. KAPLAN, USDJ

10/10/13